

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)
)
Plaintiff,)
)
v.) Case No. 2:19-CV-767-ECM
)
DYNAMIC SECURITY, INC.)
)
Defendant.)

**JOINT MOTION TO EXTEND DEADLINE FOR ALL POST
JUDGMENT RESPONSE BRIEFING PENDING MEDIATION**

COME NOW the Parties in the above styled action and move this Court to enter an order extending the time for Parties to respond to currently pending post-trial motions (Doc. 193 and Doc. 197) until fourteen days after the conclusion of the Parties' currently planned mediation.

In support of this motion, the Parties state as follows:

1. Both Parties filed post-trial motions requiring response and reply briefs, and consideration by the Court.

Joint Motion for Extension on Post Judgment Briefing
Key v. Dynamic Security, Inc.
United States District Court for the Middle District of Alabama
Civil Action 2:19-CV-767-ECM

2. This Court entered briefing orders at Doc. 198 and Doc. 199 requiring both Parties to respond to respective post-judgment briefs by May 11, 2023.
3. The Parties have agreed to attempt resolution of this matter through mediation.
4. The Parties have scheduled mediation with Mediator/Attorney Jay St. Clair for June 8, 2023.
5. In the interest of judicial economy and efficiency, Parties request the response deadlines currently set in Doc. 198 and Doc. 199 be extended until fourteen days after the conclusion of the mediation.
6. The Parties will notify the Court of the status of the mediation no later than Noon on June 12, 2023.
7. Neither Party will be prejudiced by this extension.

WHEREFORE, PREMISES CONSIDERED, the Parties seek an order extending the briefing deadlines under Doc. 198 and Doc. 199 until fourteen days after the conclusion of mediation.

Joint Motion for Extension on Post Judgment Briefing
Key v. Dynamic Security, Inc.
United States District Court for the Middle District of Alabama
Civil Action 2:19-CV-767-ECM

Respectfully submitted,

Attorneys for Plaintiff
/s/ Heather Leonard
Heather Newsom Leonard
ASB-1152-061H

OF COUNSEL:

Heather Leonard, P.C.
2105 Devereaux Cir., Suite 111
Birmingham, AL 35243
Phone: (205) 977-5421
heather@heatherleonardpc.com

/s/ Leslie A. Palmer.
Leslie A. Palmer
ASB-0436-L40P

OF COUNSEL:

Palmer Law, LLC
104 23rd Street South, Suite 100
Birmingham, AL 35233
(205) 285-3050
leslie@palmerlegalservices.com

Attorneys for Defendant
/s/ Wesley C. Redmond

OF COUNSEL:

FordHarrison LLC
420 20th Street North, Suite 2560
Birmingham, AL 35203
wredmond@fordharrison.com
Phone: (205) 244-5905

Joint Motion for Extension on Post Judgment Briefing
Key v. Dynamic Security, Inc.
United States District Court for the Middle District of Alabama
Civil Action 2:19-CV-767-ECM